



## State of New Jersey

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Alison A. Hess, C.P.G.  
Project Manager  
USEPA Region 2  
290 Broadway, 19<sup>th</sup> Floor  
New York, NY 10007-1866

June 5, 2014

Re: Standard Chlorine Chemical Company (SCCC) Site  
1015 to 1035 Belleville Turnpike  
Town of Kearny, Hudson County  
SRP PI# G000001583  
Activity Number Reference: RPC000001

Dear Ms. Hess:

The New Jersey Department of Environmental Protection (NJDEP) has completed its review of the May 2014 Screening Level Ecological Risk Assessment (SLERA) report for the Standard Chlorine Chemical Company (SCCC) Site. The NJDEP reviewed the above mentioned document in accordance with its guidance and policy, and provides the following comments and/or recommendations for your consideration.

### Introduction

The SLERA report was prepared to define potential ecological exposure scenarios, considering both current and "reasonably foreseeable future use(s) of the former SCCC Site, remedial measures completed, and ongoing and established restrictions in land use." The conclusion of the SLERA is that a Baseline Ecological Risk Assessment (BERA) is not required for the former SCCC Site. The "Site," as the description is used in the SLERA, is limited to the former SCCC upland properties, specifically excluding the riparian parcel along the Hackensack River. Be advised that there are on-going discussions between the NJDEP and the USEPA regarding the remediation of the Hackensack River. The remedial investigation of the Hackensack River sediments associated with the Standard Chlorine Site remains incomplete. The comments provided below addresses the upland portion of the Site.

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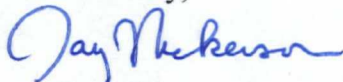
## Comments

The NJDEP has reviewed the SLERA in accordance with NJDEP guidance and policy, and finds it acceptable for the uplands portion of the Site. The following comments and recommendations are provided for your consideration:

1. All data and information presented in the SLERA are presumed to be accurate.
2. Page 1-3 makes several references to sections or text that do not exist in the document (i.e., Section 5.3, Section 5.1, and a comparison of Section 5.1 contaminant concentrations against the eco toxicity screening values in Section 4.0). The document needs to be edited and revised to accurately reflect the manner in which the SLERA was conducted.
3. Pages 2-9 and 2-10 (text accompanying Photos 11 and 12) briefly describe placement of the capillary break in areas that include reconstructed wetlands. Permeable capillary breaks such as those described do not function in inundated areas like those shown in the photos. The NJDEP has reservations about whether contaminated groundwater is adequately prevented from impacting surface water and sediments on Site. Complete exposure pathways may still exist in these wetlands. In order to assess potential exposures to eco-receptors all across the Site, NJDEP recommends surface water and sediment samples be collected from all emergent wetlands on the Site before the necessity of a BERA is negated. Several rounds of sampling may be necessary to capture the wet season.
4. Page 3-2 states that source areas were "removed". Technically they were moved to the consolidation area, not removed. The SLERA needs to more accurately reflect this.
5. NJDEP anticipates that the DNAPL and associated contaminated media outside the southwestern barrier wall will be addressed satisfactorily and expeditiously.

If you have any questions regarding this matter, you may contact me at (609) 633-1448.

Sincerely,



Jay Nickerson

Bureau of Case Management, Site Remediation Program  
New Jersey Department of Environmental Protection

cc. Jay Nickerson, BCM, NJDEP  
Steve Byrnes, BEERA, NJDEP  
David Van Eck, BGWPA, NJDEP